

1 PHILIP J. TRENCHAK, ESQ.
Nevada State Bar No. 9924
2 VICTORIA C. MULLINS, ESQ.
Nevada State Bar No. 13546
3 MULLINS & TRENCHAK, ATTORNEYS AT LAW
1614 S. Maryland Pkwy.
4 Las Vegas, Nevada 89104
5 P: (702) 778-9444
F: (702) 778-9449
6 E: phil@mullinstrenchak.com
E: victoria@mullinstrenchak.com
7 Attorneys for Plaintiff,
8 *Marisa Clark*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 MARISA CLARK, an individual,
12
13 Plaintiff,

14 vs.

15 EASTER SEALS NEVADA, a domestic
16 corporation; CHRISTINE ZACK, an individual;
17 BRIAN PATCHETT, an individual;
18
19 Defendants.

CASE NO.: 2:19-cv-00941-APG-NJK

**STIPULATED AND
ORDER FOR AN EXTENSION
OF TIME FOR PLAINTIFF TO
FILE A SECOND AMENDED COMPLAINT
OR TO FILE A RESPONSE TO THE
DEFENDANT'S MOTION TO DISMISS
THE AMENDED COMPLAINT**

20 Plaintiff, MARISA CLARK (hereinafter "Plaintiff"), by and through her attorneys, Philip J.
21 Trenchak, Esq. and Victoria C. Mullins, Esq., of Mullins & Trenchak, Attorneys at Law and Defendants
22 EasterSeals Nevada, Christine Zack, and Brian Patchett by and through Sheri M .Thome, Esq. and Chris
23 Richardson, Esq. of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP. do hereby stipulate
24 to extend the time Plaintiff has to file a Second Amended Complaint or to file A Response to The
25 Defendant's Motion to Dismiss [Docket No. 25] the Amended Complaint [Docket No. 15]. The Response
26 is currently due on August 27, 2019. The parties do hereby stipulate to a fourteen (14) day extension which
27 would give Defendant up to and including September 10, 2019 to file A Second Amended Complaint or a
28

1 Response to the Motion to Dismiss the First Amended Complaint.

2 Good cause exists for the extension as plaintiff wishes time to determine potential amendment of the
3 Complaint. Defendant has also brought up potential Rule 11 issues that Plaintiff is contemplating as well.

4
5 Dated this 27th day of August, 2019.

6 **MULLINS & TRENCHAK, ATTORNEYS**
7 **AT LAW**

8 /s/ Philip J. Trenchak
9 Philip J. Trenchak, Esq.
10 Nevada Bar No. 9924
11 1614 S. Maryland Pkwy.
12 Las Vegas, NV 89104
13 *Attorney for Plaintiff*


14 **WILSON, ELSER, MOSKOWITZ, EDELMAN, &**
15 **DICKER LLP**

16 /s/ Sheri Thome
17 Sheri Thome, Esq.
18 Nevada State Bar No. 008657
19 300 Fourth Street, 11th Floor
20 Las Vegas, NV 89101
21 Telephone: (702) 727-1400
22 Sheri.thome@wilsonelser.com
23 *Attorney for Defendant*

24 IT IS ORDERED that the parties stipulation to allow the Plaintiff up to and including September 10,
25 2019 to File a Second Amended Complaint or to file a Response to the Motion to Dismiss the First
26 Amended Complaint is GRANTED. The Plaintiff must file a Second Amended Complaint or file a
27 Response to the First Amended Complaint by September 10, 2019.

28 **ORDER**

IT IS SO ORDERED on August 28, 2019.


UNITED STATES DISTRICT JUDGE